

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

-----X  
UNITED STATES OF AMERICA :

:  
-against-  
:  
VICTOR LIPKIN, :

Defendant :

-----X  
Case No.: 14-cr-00773-RA

DECLARATION OF VICTOR  
LIPKIN IN SUPPORT OF  
MOTION TO SUPPRESS

VICTOR LIPKIN declared under penalty of perjury as follow:

1. I respectfully submit this Declaration in support of a Motion to Suppress evidence seized from Avenue V Cardiology Medical Clinic and Ave V Management located at 3025 and 3027 Avenue V Brooklyn, New York.

2. I am the owner and operator of Ave V Management company in business of daily managing and running the office operations of Avenue V Cardiology Medical Clinic.

3. I, Victor Lipkin, was the only one to oversee the office managerial operations of Avenue V Cardiology Medical Clinic and had authority to access its electronic data, tangible files, and work space.

Dated: Queens, New York  
March 25, 2016

By: Victor Lipkin  
Victor Lipkin